



MARON MARVEL BRADLEY & ANDERSON, P.A.

PAUL A. BRADLEY
Attorney At Law

Email Address:
pab@maronmarvel.com

1201 NORTH MARKET STREET, SUITE 900
WILMINGTON, DELAWARE 19801
(302) 425-5177 | (302) 425-0180 fax

Mailing Address:
P.O. Box 288
Wilmington, Delaware 19899

December 14, 2006

VIA E-FILE AND HAND DELIVERY

The Honorable Joseph J. Farnan, Jr.
United States District Court
District of Delaware
Lock Box 27
844 N. King Street, Room 4209
Wilmington, DE 19801

**Re: Creedon Controls, Inc. v. Banc One Building Corporation
and Forest Electric Corporation, C.A. No. 05-CV-300 (JJF)**

Dear Judge Farnan:

This office represents Forest Electric Corporation. Please accept this letter as a brief response to plaintiff counsel's December 5, 2006 letter. Defendants have requested that the pretrial conference occur on the first available date after the completion of expert depositions on January 15, 2007.

Plaintiff's counsel made various statements about the scheduling of the deposition of Forest Electric's expert. I offered various dates for that deposition, including November 21 and 22, 2006. Counsel claims that I failed to give any explanation as to my expert's later unavailability on November 22, 2006. Indeed, I explained to plaintiff's counsel that I mistakenly provided that date (which was the Wednesday before Thanksgiving) and that the proper dates should have been November 20 and 21, 2006. Plaintiff's counsel said that he was surprised that anyone wanted to conduct a deposition the day before Thanksgiving, especially in light of travel problems related to that time around the holiday. He agreed without hesitation to allow different dates to be supplied understanding the situation.

I have not manipulated availability of Forest's expert but, due to schedules, I was unable to offer dates other than November 20 (which was not accepted) and the time period of January 10 through January 19, 2007. Plaintiff's counsel accepted January 15, 2007 by noticing the deposition for that date.

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I will provide any additional information should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Paul A. Bradley", with a long horizontal flourish extending to the right.

Paul A. Bradley

PAB/lav

cc: Counsel of Record
Clerk of the Court